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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

RACHEL G. DAMIANO and KATIE S.
MEDART,

Plaintiffs,

v.

GRANTS PASS SCHOOL DISTRICT 7, an Oregon public body; THE MEMBERS OF THE BOARD OF EDUCATION OF GRANTS PASS SCHOOL DISTRICT 7 – Scott Nelson, Cliff Kuhlman, Gary Richardson, Debbie Brownell, Cassie Wilkins, Brian Delagrange, and Casey Durbin – in their official and personal capacities; KIRK T. KOLB, Superintendent, Grants Pass School District 7, in his official and personal capacity; and THOMAS M. BLANCHARD, Principal, North Middle School, Grants Pass School District 7, in his official and personal capacity,

Defendants.

Case No. 1:21-cv-00859-CL

DECLARATION OF KAREN M. VICKERS IN SUPPORT OF DEFENDANTS' MOTION FOR EXTENSION OF DISPOSITIVE MOTION REPLY DEADLINE

I, KAREN M. VICKERS, declare:

1. I am one of the attorneys of defendants. I make this declaration based on personal knowledge and am competent to testify as to the matters stated herein.

PAGE 1 – DECLARATION OF MS. VICKERS RE MOTION FOR EXTENSION OF DISPOSITIVE MOTION
REPLY DEADLINE

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2. Defendants requested an extension of the current reply to plaintiff's opposition to defendants' motion for summary judgment of September 6, 2022. The new proposed deadline would be September 12, 2022.

3. On August 29, 2022, Ms. Plass contacted plaintiff's counsel, Ray D. Hacke, requesting an extension of the current reply deadline. Mr. Hacke stated he opposes defendants' request for an extension. I advised Mr. Hacke that defendants would be filing the within motion and that we would note his objection.

4. Defendants request because conflicts have arisen with other court matters and with a holiday intervening between now and the current deadline, defense counsel is unable to comply with the current deadline.

5. This is the first request for an extension of this deadline.

6. This motion is made in good faith and not for purposes of delay.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: August 30, 2022.

VICKERS PLASS LLC

s/ Karen M. Vickers
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PAGE 2 – DECLARATION OF MS. VICKERS RE MOTION FOR EXTENSION OF DISPOSITIVE MOTION
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